

August 24, 2004

Steven J. Barbee, Ph.D.  
Director, Environmental Hygiene and Toxicology  
Arch Chemicals, Inc.  
501 Merritt 7, P.O. Box 5204  
Norwalk, CT 06856-5204

Dear Dr. Barbee:

The Office of Pollution Prevention and Toxics is providing the following preliminary comments on the robust summaries and test plan for polyphosphoric acid esters of triethanolamine, sodium salts (CAS No. 68131-72-6), posted on the ChemRTK HPV Challenge Program Web site on February 11, 2004. I commend Arch chemicals, Inc. for their commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has reviewed this submission and has reached the following conclusions:

EPA considers that triethanolamine is not acceptable as an analog for polyphosphoric acid esters of triethanolamine, sodium salts because these two chemicals differ in structure, chemical class, and physicochemical properties. In addition, the submitter failed to provide metabolism data that show rapid hydrolysis of the test substance to triethanolamine and phosphate, and the discussion in the test plan was speculative (e.g., "Metabolically, [the substance] could undergo hydrolysis..."). No test data were submitted for the sponsored chemical. The submitter needs to provide adequate SIDS-level data on the sponsored substance for all endpoints or provide data from a more suitable analog.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that Arch Chemicals advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission.

If you have any questions about this response, please contact Dr. Ralph Northrop, of the HPV Chemicals Challenge Program, at 202-564-7666. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director  
Risk Assessment Division

Enclosure

cc: W. Penberthy  
M. E. Weber